Community-Based Corrections Plan to Expand the Adult Detention Center for Loudoun County, Virginia

Addendum June 2005



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Introduction

In February of 2005, a Community-Based Corrections Plan (CBCP) and Planning Study for the expansion of the Loudoun County Adult Detention Center were submitted to the Virginia Department of Corrections (DOC) for review. The plans were developed by The Facility Group, in association with Phillips Swager Associates (PSA) and Dewberry (civil engineers).

The plans were prepared consistent with the requirements for Community-Based Corrections Plans and Planning Studies in the Virginia Board of Corrections' <u>Standards for Planning</u>, <u>Design</u>, <u>Construction and Reimbursement of Local Correctional Facilities</u> (effective July 1, 1994), Article 2, for the purpose of seeking reimbursement from the Commonwealth of Virginia for the maximum allowable capital costs associated with the expansion of the Loudoun County Adult Detention Center, which is currently under construction.

In April of 2005, the County was notified by the DOC that the CBCP had undergone an interagency review for compliance with the Board of Corrections' <u>Standards</u>. The letter provided "a consolidation of analysts' comments," and noted that "additional information, as well as some clarifications of information, will be required to bring the plan into compliance." ¹

The purpose of this addendum is to provide the additional information and clarifications requested by the interagency review team. The information in this addendum is intended to supplement the material contained in the original CBCP. The addendum is organized in the same manner as the review team's comments, in order to provide a point-by-point response.

§2.5 G.2.b. — Current Operating Capacity

<u>Standards</u> require that the CBCP include "the current operating capacity as established by the Department of Corrections." ²

The review team commented, "The Plan states the combined operating capacity of the main jail and work release facilities is 141 beds. The correct operating capacity should be 109 beds (i.e. 62 beds in the main facility and 47 beds in the work release annex.)." ³

The review team is correct. The CBCP was incorrect when it referred to the operating capacity of the main jail as being 109 beds, and the work release center with 32 beds, for a combined operating capacity of 141 beds.⁴

^{1.} Letter from Ron Elliott, Local Facilities Supervisor, DOC Compliance & Accreditation Unit, to Kirby Bowers, Loudoun County Administrator, April 27, 2005, page 1.

^{2. &}lt;u>Standards for Planning, Design, Construction and Reimbursement of Local Correctional Facilities</u>, Virginia Board of Corrections, §2.5 G.2.b., page 11 of 76.

^{3.} Letter from Ron Elliott, April 27, 2005, page 1.

The existing Adult Detention Center has 62 cells (at 35 square feet per cell), organized into 14 separate housing blocks on the facility's three floors (ground floor, first floor, and second floor). The facility originally opened as a 26-bed facility in 1958. In 1972, the facility was expanded by 36 cells.

General Population Housing at the Current Adult Detention Center

	Cell	Number
Floor	Block	of Cells
	1	3
Ground	2	3
Floor	3	6
	4	6
	5	3
First	6	3
Floor	7	6
	8	6
	9	3
	10	- 3
Second	11	4
Floor	12	4
	13	6
	14	6
Total		62

In addition, all three floors have two segregation cells (at 35 SF, with no dayspace). The first and second floors also each have a single isolation cell (at 52 SF, with no dayspace). There are also four holding cells in the booking area, which is located on the ground floor.

The Loudoun County Work Release Center opened as a 27-bed unit in 1989. In 1995, a second housing wing and support area were added, raising its capacity to 47 beds, and allowing the facility to house both male and female inmates.

^{4.} See Community-Based Corrections Plan to Expand the Adult Detention Center for Loudoun County, Virginia, (CBCP), February 2005, pages I - 3, II - 18, and II - 20. See also Planning Study to Expand the Adult Detention Center for Loudoun County, Virginia, February 2005, page I - 3.

As noted in the CBCP, upon completion and occupancy of the new Adult Detention Center, the old facility will be demolished to provide additional parking for the existing courts. The Work Release Center will be used as a juvenile detention center, and will provide minimum and medium security transitional housing.

§2.5 G.5.b.(1) — Average Annual Population by Detention Category

<u>Standards</u> require that the CBCP include, for the past three years, "The average annual population for each of the detention categories reported on the *Population Survey of Local Correctional Facilities* (Tuesday Report) including a calculation of the percent of the total accounted for by each of the detention categories, juveniles as well as adults." ⁵

The review team commented, "Detention categories are not reported in accordance with the 'Tuesday Report'." ⁶

As noted in the CBCP, the Tuesday Reports break down the jail population in two ways. First, they provide a breakdown of the jail population by males and females, adults and juveniles. Second, they provide a breakdown of the jail population by the inmates' court status (i.e., awaiting trial vs. sentenced, misdemeanor vs. felony, local vs. state responsible, etc.).

For ease of reference, the CBCP provided the average annual population for each of the detention categories in the Tuesday Reports, for each of the past four years (2001 – 2004), including a breakdown by gender (i.e., adult males and adult females), and a breakdown by Local / State Responsible population. The Local Responsible (LR) population included the detention categories of Unsentenced/Awaiting Trial, LR Felony Sentences, Misdemeanor Sentences, and Ordinance Sentences. The State Responsible (SR) population included all SR detention categories.⁷

The table on the following page provides a breakdown of the average annual inmate population at the Loudoun County Adult Detention Center for each of the Tuesday Report detention categories, as they are listed in the reports, including the percent of the total accounted for by each of the detention categories.

^{5.} Standards, §2.5 G.5.b.(1), page 13 of 76.

^{6.} Letter from Ron Elliott, April 27, 2005, page 1.

^{7.} See Community-Based Corrections Plan to Expand the Adult Detention Center, February 2005, pages II - 30 through II - 35.

Average Tuesday Population at the Loudoun County Adult Detention Center

Detention Category	2001 Average		2002 Average		2003 Average		2004 Average	
Operational Capacity	109	77%	109	70%	109	68%	109	65%
Juveniles	0	0%	0	0%	0	0%	0	0%
Female Adults	14	10%	21	13%	21	13%	25	15%
Male Adults	123	87%	132	86%	139	87%	141	85%
Held for Other Locality	22	16%	20	13%	18	11%	6	4%
Unsent. Awaiting Trial	57	40%	71	46%	73	46%	82	49%
Unsent. Awaiting Trial Ordinances Only	1	0%	0	0%	2	1%	2	1%
Awaiting Trial (Pending Felony) with Sentence	21	15%	18	12%	16	10%	15	9%
Awaiting Trial (Pending Misd) with Sentence	4	3%	2	1%	2	1%	1	1%
Awaiting Trial (Pending Ord) with Sent. Ord	0	0%	0	0%	0	0%	0	0%
All Misd. Sentences	14	10%	13	8%	11	7%	14	9%
All Ord. Sentences	0	0%	0	0%	0	0%	1	1%
LR – Sent. <= 2 Years	0	0%	0	0%	0	0%	0	0%
SR – Sent. > 2 Years	0	0%	0	0%	0	0%	1	1%
SR Felon B Within 1st 30 Days of Sentencing	0	0%	0	0%	0	0%	0	0%
LR – Sent. < 1 Year	11	8%	10	6%	12	8%	11	6%
SR – Sent. => 1 Year	14	10%	16	11%	22	13%	16	10%
SR Felon A Within 1st 30 Days of Sentencing	4	3%	4	3%	5	3%	4	2%
LR - Sent. = 12 Months	3	2%	5	3%	3	2%	5	3%
SR – Held by Agreement	4	3%	6	4%	5	3%	1	0%
SR – Jail Contract Bed	0	0%	0	0%	0	0%	0	0%
SR – JCB/Work Release	4	3%	6	4%	10	6%	8	5%
Federal Inmates	5	3%	2	1%	0	0%	1	0%
Contract Inmates	0	0% .	0	0%	0	0%	0	0%
Private Transport	0	0%	0	0%	0	0%	0	0%
Total Local Resp. Pop. (Female)	11	8%	16	10%	14	9%	20	12%
Total Local Resp. Pop. (Male)	101	71%	104	67%	106	66%	113	68%
Total Local Resp. Pop.	111	78%	120	77%	119	75%	131	79%
Total State Resp. Pop. (Female)	3	2%	5	3%	7	5%	5	3%
Total State Resp. Pop. (Male)	23	16%	29	19%	33	21%	30	18%
Total State Resp. Pop.	26	19%	33	22%	40	25%	35	21%
Grand Total	142	100%	155	100%	160	100%	167	100%

Source: Population Survey of Local Correctional Facilities (Tuesday Reports), State Compensation Board, 2001 – 2004.

§2.5 G.6.a. — Inmate Population Projections

<u>Standards</u> require that the CBCP include, "A forecast of the future total average daily population for a minimum of ten years, excluding federal prisoners"

The review team commented, "The Plan provides a descriptive trend-line of projected inmate population growth without a statistical modeling analysis, diagnostics or fit for the forecast statistic (see attached Department of Criminal Justice's 'Forecast Review' comments)." ⁹

The DCJS Forecast Review provided the following "reservations concerning the forecast conducted for the Adult Detention Center for Loudoun County."

1. I am not clear on the chosen model. The Facility Group chose a linear trend model.

Does this simply mean that we fit a trend line to the data and pick a point? The report doesn't specify why they choose or how they developed the "linear trend" model.

- 2. No diagnostic or fit statistics were presented to check whether the chosen model was the best model they can pick.
- 3. While neither was the chosen methodology, the report examines and elaborates on the prior use of the Ratio and Rate of Incarceration methods.
- 4. Why are they comparing the projection results from 1999 CBCP and projections from 2000 CBCP? I think that is irrelevant, especially the detailed information concerning the inadequacy of the 1999 models for jail population forecasting.
- 5. Why did they not apply the new jail population data, which shows a significant increase during the past two years, to the ARIMA (Box-Jenkins) and Exponential Smoothing (Winters and Holt) used in past studies to determine the adequacy of these models?

^{8.} Standards, §2.5 G.6.a, page 14 of 76.

^{9.} Letter from Ron Elliott, April 27, 2005, page 1.

The Jail Population Forecast in the CBCP included:

- A review of the inmate population projections from the 1999 Community-Based Corrections Plan for Loudoun County and the 2000 Addendum, and compared the results of these projections with the County's actual inmate population to date;
- Current inmate population projections for the County for the next ten years for facility planning purposes; and
- A forecast of jail capacity requirements for the County, based on the current inmate population projections. 10

Loudoun County is in a unique situation. The County is in the process of constructing a new jail facility that is undersized to hold the County's current inmate population. The County has already recorded a total average daily population (ADP) of 284 inmates (in September 2004), which is almost one-third more than the new facility's design capacity of 196 beds.

The County's inmate population already exceeds the 20-year projections that were developed as part of the 1999 Community-Based Corrections Plan and the 2000 Addendum to the Community-Based Corrections Plan.

- In 2004, Loudoun County had a total combined ADP of 267 inmates, including inmates housed at the Loudoun County Adult Detention Center, the Peumansend Creek Regional Jail, and the Blue Ridge Regional Jail.
- The 1999 CBCP estimated that Loudoun County will have an ADP of approximately 142 inmates in 2004, increasing to an ADP of 203 inmates in 20 years (i.e., by 2017).
- The 2000 Addendum to the CBCP estimated that Loudoun County will have an ADP of 168 inmates in 2004, increasing to an ADP of 254 inmates by 2016.

Inmate population projections are a sensitive issue in Loudoun County. The projections that were developed as part of the jail planning process ultimately led to the new facility currently under construction. These projections affected a number of critical planning and design issues in the new facility, including decisions regarding the facility's operational capacity, the size and design of the support systems and functional areas (including food service, administration, etc.), and site plans for the facility's future expansion.

One of the comments in the DCJS Forecast Review was "Why are they comparing the projection results from 1999 CBCP and projections from 2000 CBCP? I think that is irrelevant, especially the detailed information concerning the inadequacy of the 1999 models for jail population forecasting."

^{10.} See Community-Based Corrections Plan to Expand the Adult Detention Center, February 2005, Section V., pages V - 1 through V - 16.

Because of Loudoun County's unique situation, we believe it was important for the current CBCP to provide a review of the past projections and the methodologies that were used to develop them. The past projections were developed by two different and experienced jail consultants, applying different forecasting methodologies. In fact, the projections in the 1999 CBCP were an average of the results of six different forecasting models — all of which are legitimate and often-used methods for developing inmate population projections. These methods included projections based on:

- ADP percentage increase;
- ADP actual number increase;
- Modified ADP percentage change;
- Incarceration rate percentage change;
- Exponential smoothing Holt Model; and
- Exponential smoothing Winters Model.

And yet, only six years later, the County has already exceeded the 20-year projections from both of the County's previous jail consultants. In hindsight, it is clear that none of the inmate population projection methods that were used in the 1999 CBCP and the 2000 Addendum produced reliable results for facility planning purposes in Loudoun County. Therefore, we believe it is important that these models not be used again as part of the expansion planning that the County must now confront — still six months from the completion of construction of the new facility.

One of the comments in the DCJS Forecast Review was that "the report doesn't specify why they choose" the forecasting model that was used in the CBCP. Frankly, one of the reasons that the linear trend was used as the "chosen model" is that it was *not* one of the other forecasting methods that have been unsuccessfully applied to Loudoun County.

Another one of the review comments questioned "Why did they not apply the new jail population data, which shows a significant increase during the past two years, to the ARIMA (Box-Jenkins) and Exponential Smoothing (Winters and Holt) used in past studies to determine the adequacy of these models?" Again, it was clear that *none* of the inmate population projection methods that were used in the 1999 CBCP and the 2000 Addendum produced reliable results for Loudoun County, and so the decision was made to *not* use any of the models that had been previously used, as they had not produced reliable results for facility planning purposes. In addition, in our experience and opinion, the ARIMA time series method works best for making short-term projections, such as for the next three to five years (at most), and is not an appropriate forecasting technique for making long range projections for ten to 20 years out.

As was noted in the CBCP:

There is no commonly-accepted methodology for making inmate population projections. Neither the National Institute of Corrections (NIC) nor the American Correctional Association (ACA) recommends or endorses any particular forecasting methodology. Models that work well in one jurisdiction may or may not produce a reliable forecast in another jurisdiction. Although critical to the planning process, jurisdictions are left to determine which trends and which mathematical models will provide them with reasonable growth estimates for facility planning purposes. 11

There are a number of other reasons why the linear trend model was chosen for the CBCP. As shown in the CBCP, the County's inmate population growth over the past eight years (1997 through 2004) has been increasing in a linear manner, with the County's total combined ADP tracking very closely to the linear trend line. ¹²

Use of the linear growth trend is also supported by other factors, including the projected growth in Loudoun County's total population. As noted in the CBCP, "from 1990 to 2000, the population of Loudoun County almost doubled. And from 2000 to 2020, the County's population is expected to double again." ¹³

Another reason that the linear trend model was used is because it is easy to understand. As was noted in the CBCP:

There are numerous different forecasting models. Some can be very complex, and some can be fairly simple. As consultants, we have been preparing inmate population projections for cities and counties — and reviewing the projections of other consultants — for more than 15 years. In our experience, the statistically complex models do not necessarily produce more accurate projections, and suffer in their complexity by being difficult for citizens and elected officials to understand or explain. ¹⁴

^{11.} CBCP to Expand the Adult Detention Center, February 2005, page V - 6. (Emphasis added.)

^{12.} See CBCP to Expand the Adult Detention Center, February 2005, page II - 27.

^{13.} CBCP to Expand the Adult Detention Center, February 2005, page V - 5.

^{14.} CBCP to Expand the Adult Detention Center, February 2005, page V - 7. (Emphasis added.)

The 2000 Addendum to the CBCP, for example, provided an extensive and complex statistical justification for the projection methodology that was used, including the comparison of a number of different Box-Jenkins models, using a software program titled *Forecast Pro* developed by Business Forecast Systems.¹⁵ And yet, within four years, the County had almost 100 more inmates that what had been projected for 2004, and more inmates than had been projected for the year 2016.

As was noted in the CBCP:

In our opinion, inmate population projections should meet two tests — they should be *reasonable*, and they should be *rationally derived*. In other words, the projections should be reasonable, given the County's recent history and current trends, and they should be developed using some sort of a mathematical model that yields the results, and which is replicable. ¹⁶

We believe that the linear trend model that was used as the basis for the inmate population projections in the CBCP meets these two tests. The baseline projections are reasonable, given the County's recent history and current trends, and they were developed using a mathematical model with replicable results.

The inmate population projections in the CBCP were based on the linear trend in Loudoun County's actual inmate population over the past eight years (i.e., January 1997 through December 2004) — using a total of 96 monthly data points. Linear regression was used to produce the slope of a line that best fits a single set of data. The statistics for the trend line were established using the "least squares" method to calculate a straight line that best fit the ADP data. Using regression analysis, the trend line was then extended to provide the baseline ADP projections.

The DCJR Forecast Review mentioned that the CBCP did not present diagnostic or fit statistics for the chosen model. These regression statistics are shown in the table on the following page.

^{15.} See Addendum to the Loudoun County Community-Based Corrections Plan, Powell Consulting Services, April 24, 2000, pages 14 – 15.

^{16.} CBCP to Expand the Adult Detention Center, February 2005, pages V - 6 and V - 7. (Emphasis added.)

Specifications, Parameters, and Diagnostic Information

Regression Statistics					
Multiple R	0.981877135				
R Square	0.964082708				
Adjusted R Square	0.963700609				
Standard Error	10.16693472				
Observations	96				

The DCJS Forecast Review noted that "While neither was the chosen methodology, the report examines and elaborates on the prior use of the Ratio and Rate of Incarceration methods." To be clear, the Jail Population Forecast in the CBCP included the results from two other commonly used forecasting techniques — the ratio method and the average length of stay — using the most recent jail data available. (It did not "examine and elaborate on the *prior* use" of these methods.)

- The ratio method assumes that there is a statistical correlation between the growth in the County's total population and the growth in the County's jail population. Once the County's rate of incarceration (ROI) is established, it can be applied to the County's population projections to estimate the size of the County's jail population in the future.
- The average length of stay (ALOS) method assumes that there is a statistical correlation between the growth in the number of jail admissions and the growth in the County's jail population. Once this correlation is established, it can be applied to the County's jail admission trend projections to estimate the size of the County's jail population in the future.

These are both commonly used forecasting models, and both methods produced results that were almost identical to the linear trend projections. However, as noted in the CBCP, both of these methods are based on a number of key assumptions that, in our experience, are not reliable for accurately estimating the size of Loudoun County's future inmate population. Therefore, the linear trend was recommended.

Finally, as noted in the CBCP:

Obviously, inmate population projections are not an exact science. There are a multitude of ever-changing variables, both tangible and intangible, that can directly impact the size of the County's jail population. The County's growing and changing population, public attitudes toward crime, changes in criminal penalties, law enforcement practices, sentencing policies, and crime rates will all

have a direct impact on the County's future jail population and its need for additional jail capacity. Nonetheless, it is believed that the baseline inmate population projections presented here provide reasonable facility planning goals for Loudoun County. ¹⁷

§2.5 G.9. — Recommended Size of the Proposed Facility

<u>Standards</u> require that the CBCP include: "The recommended size of the proposed facility including the total number of cells, dormitories or housing units necessary for general population, community custody, special purpose, and short term population management." ¹⁸

The review team commented, "The Plan needs to address any 'Community Custody' housing needs in accordance with Item #416 E.1. of the 2005 Acts of Assembly (Budget Bill). This same requirement appears in the 2004 Acts of Assembly. Also descriptions and tables on pgs. VII-2 and VII-4 provide different total general population bed counts." ¹⁹

Item 416 E.1. of the 2005 Acts of Assembly provides as follows:

The Board of Corrections shall not approve or commit additional funds for the state share of the cost of construction, enlargement, or renovation of a local or regional jail facility, except when such project is proposed to be built using Community Custody Facilities Standards, as adopted by the Board, unless the use of more expensive construction standards is justified, based on a documented projection of offender populations that would require a higher level of security.

The new Loudoun County Adult Detention Center that is currently under construction includes a Community Custody Unit with four minimum-security dormitories for general population inmates. These four dormitories provide a total of 56 beds (or 29 percent of the facility's initial design capacity of 196 beds), including a 24-bed male dormitory, a 12-bed female dormitory, a 12-bed "swing" dormitory (that can be used for either males or females, as needed), and an 8-bed trusty dormitory. These four dormitories are located in a separate wing from the new facility's other general population and special purpose housing units, and have access to their own separate facility entrance. A separate control station and administration space are also provided as part of the new facility's Community Custody Unit.

^{17.} CBCP to Expand the Adult Detention Center, February 2005, page V - 7.

^{18.} Standards, §2.5 G.9., page 16 of 76.

^{19.} Letter from Ron Elliott, April 27, 2005, pages 1 – 2.

The facility expansion plan outlined in the Planning Study includes additional inmate housing, including a general housing expansion, special housing expansion, medical / mental health housing expansion, and a classification housing expansion. The new classification housing pod will be attached to and extend from the Community Custody Unit in the new facility, and will provide 12 two-person cells on each of two levels, for a total of 24 double cells (48 beds).

Additional community custody housing was not provided as part of the facility expansion plan for two reasons. First, the four minimum-security dormitories in the Community Custody Unit in the new facility comprise 29 percent of the facility's initial design capacity (i.e., 56 of the 196 beds). Second, Loudoun County is a member of the Peumansend Creek Regional Jail, and pays a fixed annual rate to utilize up to 40 minimum-security beds at that facility. Together, the new facility and Peumansend Creek Regional Jail provide the County with a total of 96 beds of minimum security inmate housing, which should be sufficient for the County's minimum custody needs.

The CBCP noted as follows:

It is very important that these projections be considered as part of the jail planning process. However, other factors also need to be considered when making important architectural decisions regarding the number and type of jail beds (i.e., dorms, single cells, or double cells) to be included in the expanded facility. The appropriate size for the facility expansion may be based on (1) site limitations, (2) the geometry of the building, (3) the staffing requirements, and/or (4) what the County can afford, as much as any other factor.

Consideration also has to be given to the changing profile of the County's inmate population, which has significant implications for the number — and more importantly, the type — of jail beds needed by the County. In years past, most jails attempted to provide some sort of balance between minimum, medium, and maximum security housing. Today, the problem is more complicated. Many of the inmates who were considered "minimum security" ten to 20 years ago are not even in jail today, and are being supervised in alternative and diversionary programs. By "skimming off the cream of the crop," however, most jails are finding that they are running out of "good inmates," and increasingly have to accommodate higher-risk offenders. Inmate populations are also becoming increasing comprised of inmates with special needs or who require special management. These and other factors all affect the number and type of jail beds needed by the County to effectively and efficiently support its inmate population.

In addition, even though the County does not have a large number of female inmates, more females are being incarcerated now than in years past, and that trend is expected to continue. This can push the inmate population projections even higher, since the forecast is based on historical trends. The growing number of female inmates should also be carefully considered in deciding both the number and type of beds to be provided for females. ²⁰

With regard to the general population bed counts, the expansion plan for the new Adult Detention Center includes the construction of four new inmate housing pods, attached to and extending out from the facility's four existing housing units.

- General Housing Expansion. One new housing pod will be attached to and extend from the existing General Housing Unit. The expansion will have two separate housing areas, each with 24 cells sized for two inmates, similar to the layout of the existing General Housing Unit. By double-bunking half the cells in each area (i.e., two inmates per cell on the lower level, and single occupancy on the mezzanine level), a total of 72 general population beds will be added.
- Special Housing Expansion. One new pod will be attached to and extend from the existing Special Housing Unit. This will add four additional housing areas two with 12 cells (12 beds) and two with 16 cells (16 beds) similar to the layout of the existing Special Housing Unit. This will add a total of 56 beds (40 general population beds and 16 special purpose beds).
- Medical / Mental Health Housing Expansion. One new pod will be attached to and extend from the existing Female Housing Unit, and will be used to provide additional medical and mental health housing. This would add four additional housing areas each with six cells (6 beds) similar to the layout of the existing Female Housing Unit. This will add a total of 24 beds (18 general population beds and 6 special purpose beds), designed for medical and mental health housing.
- Classification Housing Expansion. One new housing pod will be attached to and extend from the existing Community Custody Unit. The expansion will have 12 two-person cells on each of two levels, for a total of 24 cells (48 beds) for general population inmates.

^{20.} CBCP to Expand the Adult Detention Center, February 2005, pages V - 15 and V - 16.

General Population and Special Purpose Housing in the Facility Expansion Plan

Facility Expansion Plan	Total Cells	General Population Beds	Special Purpose Beds
New General Housing	48	72	0
New Special Housing	56	40	16
New Medical / Mental Health Housing	24	18	6
New Classification Housing	24	48	0
Total in Expansion Plan	152	178	22

Additional information regarding the Community Custody Unit in the new facility currently under construction, the facility expansion plan, and applicable construction standards is provided in the Planning Study for the Expansion of the Adult Detention Center for Loudoun County, Virginia, which was submitted in conjunction with the Community-Based Correction Plan.